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Wells Fargo Bank, N.A.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

In re Wells Fargo Mortgage Discrimination Litigation

Case No. 3:22-cv-00990-JD

**DECLARATION OF AMANDA L. GROVES
IN SUPPORT OF DEFENDANT WELLS
FARGO BANK, N.A.'S MOTION FOR
SUMMARY JUDGMENT**

1 I, Amanda L. Groves, hereby declare, under penalty of perjury, as follows:

2 1. I am a partner at Winston & Strawn LLP, counsel for Defendant Wells Fargo Bank, N.A.
3 (“Wells Fargo”) in this matter. I make this declaration based on my personal knowledge and in support of
4 Wells Fargo’s Motion for Summary Judgment.

5 2. I am personally familiar with the facts set forth in this declaration. If called as a witness, I
6 could and would competently testify to the matters stated herein.

7 3. Attached as **Exhibit 1** is a true and correct copy of excerpts of the February 6, 2024
8 deposition of Joel Brodsky, Ph.D.

9 4. Attached as **Exhibit 2** is a true and correct copy of excerpts of the December 7, 2023
10 Deposition of Mary Dee Lemaire.

11 5. Attached as **Exhibit 3** is a true and correct copy of Plaintiff Aaron Braxton’s Objections
12 and Response to Wells Fargo Bank, N.A.’s Interrogatories, Set No. One, Interrogatory No. 6.

13 6. Attached as **Exhibit 4** is a true and correct copy of excerpts of the November 7, 2023
14 deposition of Aaron Braxton.

15 7. Attached as **Exhibit 5** is a true and correct copy of excerpts of the October 19, 2023
16 deposition of Bryan A. Brown.

17 8. Attached as **Exhibit 6** is a true and correct copy of excerpts of the October 27, 2023
18 deposition of Ifeoma Ebo.

19 9. Attached as **Exhibit 7** is a true and correct copy of excerpts of the December 1, 2023
20 deposition of Dr. Gia Gray.

21 10. Attached as **Exhibit 8** is a true and correct copy of Exhibit 339 to the December 1, 2023
22 deposition of Dr. Gia Gray.

23 11. Attached as **Exhibit 9** is a true and correct copy of Exhibit 341 to the December 1, 2023
24 deposition of Dr. Gia Gray.

25 12. Attached as **Exhibit 10** is a true and correct copy of Exhibit 344 to the December 1, 2023
26 deposition of Dr. Gia Gray.

1 13. Attached as **Exhibit 11** is a true and correct copy of excerpts of the October 26, 2023
2 deposition of Phillip Joseph Figone.

3 14. Attached as **Exhibit 12** is a true and correct copy of Exhibit 111 to the October 26, 2023
4 deposition of Phillip Joseph Figone.

5 15. Attached as **Exhibit 13** is a true and correct copy of Exhibit 112 to the October 26, 2023
6 deposition of Phillip Joseph Figone.

7 16. Attached as **Exhibit 14** is a true and correct copy of Exhibit 113 to the October 26, 2023
8 deposition of Phillip Joseph Figone.

9 17. Attached as **Exhibit 15** is a true and correct copy of Exhibit 114 to the October 26, 2023
10 deposition of Phillip Joseph Figone.

11 18. Attached as **Exhibit 16** are true and correct copies of the Voluntary Petition, Notice of
12 Conversion, and Order of Discharge filed in the bankruptcy proceeding of Terah Kuykendall-Montoya
13 and Danny Montoya, Case No. 14-50500-cag (Bankr. W.D. Tex.).

14 19. Attached as **Exhibit 17** is a true and correct copy of excerpts of the January 25, 2024
15 deposition of Terah Kuykendall-Montoya.

16 20. Attached as **Exhibit 18** is a true and correct copy of Exhibit 440 to the January 25, 2024
17 deposition of Terah Kuykendall-Montoya.

18 21. Attached as **Exhibit 19** is a true and correct copy of Exhibit 445 to the January 25, 2024
19 deposition of Terah Kuykendall-Montoya.

20 22. Attached as **Exhibit 20** is a true and correct copy of Exhibit 447 to the January 25, 2024
21 deposition of Terah Kuykendall-Montoya.

22 23. Attached as **Exhibit 21** is a true and correct copy of excerpts of the November 21, 2023
23 deposition of Paul Martin.

24 24. Attached as **Exhibit 22** is a true and correct copy of Exhibit 319 to the November 21, 2023
25 deposition of Paul Martin.

26 25. Attached as **Exhibit 23** is a true and correct copy of Exhibit 320 to the November 21, 2023
27 deposition of Paul Martin.

26. Attached as **Exhibit 24** is a true and correct copy of excerpts of the October 30, 2023 deposition of Elretha Jonetta Perkins.

27. Attached as **Exhibit 25** is a true and correct copy of Exhibit 147 to the October 30, 2023 deposition of Elretha Jonetta Perkins.

28. Attached as **Exhibit 26** is a true and correct copy of excerpts of the January 31, 2024 deposition of Christopher Williams.

29. Attached as **Exhibit 27** is a true and correct copy of excerpts of the April 9, 2024 deposition of Amanda Kurzendoerfer, Ph.D.

30. Attached as **Exhibit 28** are true and correct copies of excerpts of the March 26, 2024 deposition of Michael Wallace.

Dated: July 25, 2024

By:/s/ Amanda L. Groves
Amanda L. Groves